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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No. 4:19-CR-00394 CDP
CAMERON TAYLOR,)
Defendant.)

MOTION TO CONTINUE SENTENCING AND MOTION TO SET DATE FOR PLEA ON NEW INFORMATION

COME NOW Defendant, by and through Counsel, and moves to continue the sentencing herein. In support, Defendant states that his sentencing is presently scheduled for November 6, 2020. The Assistant United States Attorney has alerted Counsel that she intends to pursue additional charges against Defendant and has conveyed to Counsel a proposed Information and Plea and Stipulation agreement. Defendant is prepared to plead to the new Information. The parties are requesting that the new case and the instant case be consolidated for sentencing.

WHEREFORE, the parties respectfully move the Court to schedule Defendant's plea on the new Information on November 6, 2020 at 2:00 p.m. (the time presently scheduled for sentencing) reset the sentencing date hear for a consolidated sentencing hearing.

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Respectfully Submitted:

Moran & Goldstein, L.C.

/S/ WILLIAM GOLDSTEIN

William C.E. Goldstein Attorney-at-Law, # 39575MO 225 S. Meramec Ave., Ste. 1200 St. Louis, MO 63105 (314) 932.2220

Signature above is also certification that a true and correct copy of the above and foregoing document has been filed this 30th day of October, 2020, with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Office of the United